

# Law Office of Angus James Bell

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December 21, 2020

Via ECF

Honorable John G. Koeltl  
United States District Court Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: United States v. Nester Fernandez  
19 Cr 747 (JGK)

Dear Judge Koeltl:

I am the attorney for Mr. Nester Fernandez in the above referenced matter and write this letter seeking the Court's reconsideration of its decision to deny our latest request for a temporary modification of his bond.

Mr. Fernandez would like to Court to know that this trip was planned as a surprise for his wife in the last trimester of a difficult pregnancy. After consulting with their physician it is believed that such a trip, away from their small apartment and other anxieties of their daily lives, could relieve some of her stress. Also known given Mr. Fernandez's condition, they vigilantly limit their contact with those outside their immediate family and regularly submit to COVID testing.

As previously noted, if approved, Mr. Fernandez and his wife will drive to Florida on December 27<sup>th</sup>. Instead of staying with family, they are able to secure a hotel and return to the District on January 2, 2021.

Thank you in advance for any and all consideration of this application. We will await further instructions from the Court on this matter.

*Application for reconsideration  
is denied. Non-essential  
travel from New York State is  
strongly discouraged. There is  
no reasonable way to assure the  
safety of the defendant, his wife, and others when the defendant  
seeks to travel to Florida for a family gathering, and when  
quarantine requirements will apply on return.  
Respectfully,  
A. James Bell, Esq.  
So ordered. JGK/Jetey/U.S.D. -  
12/21/20*